REMARKS/ARGUMENTS

As filed, the application included claims 1-39. An Office Action mailed January 28, 2005, rejected claims 1-39 under 35 U.S.C. § 103(a) as being unpatentable over US Patent No. 5,999,911 to Berg et al. ("Berg").

This amendment amends claims 1, 13, 22 and 33 and adds new claims 40-46. Hence, after entry of this amendment, claims 1-40 stand pending for examination.

Claim Amendments

Claim 1, 13, 22 and 33 have been amended. Claims 1, 22 and 33 have been amended to include the term "for managing entity identities." The same claims have been amended to recite "creating a definition of a first workflow for managing at least one identity of at least one entity, based on said template . . . ." Support for these amendments may be found, inter alia, at lines 10-12 on page 8 of the application, at lines 31-32 on page 32 of the application and/or at lines 4-6 on page 41 of the application.

Claim 1 has been further amended to recite that the identity system performs the steps of accessing the template and storing the workflow definition. Support for this amendment can be found, inter alia, at lines 17-20 on page 41 of the application.

Claim 13 has been amended to comport with the amendments to claim 1.

New claims 40-46 have been added to the application. Support for new claims 40-41 may be found, inter alia, in Table 1 on pages 33-34 of the application. Support for new claims 42-46 may be found in the application, inter alia, at page 49, line 15 through page 51, line 10.

Rejections under 35 U.S.C. § 103(a)

The office action rejected all pending claims under § 103(a) as unpatentable over Berg. The applicant respectfully traverses the rejections and submits the following arguments in support of her position.

The cited reference fails to teach or suggest each element of any pending claim. For example, as amended, claim 1 recites, inter alia, "creating a definition of a first workflow for

managing at least one identity of at least one entity . . . ." Berg, which is directed to "a system for managing complex design processes," (c. 1, ll. 7-8) fails to teach at least this element. Further, while both Berg and the present claims concern workflow management, they are directed to quite different applications. Berg concerns the management of various tools used in "complex design processes" in the design automation field; in contrast, claim 1 concerns the management of workflow in the process of managing the identities of entities in a computer system.

There is no teaching or suggestion in Berg that the design automation workflow disclosed by Berg might be used to create workflows for managing entity identities. Indeed, while Berg describes several tools that might be used to accomplish the tasks in a design automation workflow, none of those tools would appear to be suitable for identity management. Hence, claim 1 is believed to be allowable over the Berg reference. For at least similar reasons, independent claims 22 and 33 are believed to be allowable as well.

Dependent claims 2-21, 23-32 and 34-45 are believed to be allowable as depending from allowable base claims and as being directed to specific novel substitutes. Merely by way of example, claim 35 recites that "said steps of accessing, creating and storing are performed by an integrated identity and access system." Nothing in Berg teaches or suggest an integrated identity and access system. Instead, as noted above, Berg is directed to a design automation system. Claim 35, for at least this additional reason, is allowable over Berg.

As another example, new claim 40 recites that "the workflow performs a task selected from the group consisting of: creating a user, deleting a user, subscribing a user to a group, enrolling a certificate, renewing a certificate, revoking a certificate, and changing a user attribute." Nothing in Berg teaches or suggests that Berg's workflow system could accomplish any of these tasks, and claim 40 therefore is allowable over Berg.

Similarly, claim 41 recites, inter alia, "the client program invoking the callback URL; and upon an invocation of the callback URL, the workflow engine restarting the workflow" Berg does not teach or suggest the invocation of a callback URL as a trigger for restarting the workflow. Instead, Berg (c. 17, ll. 6-20) uses an API structure to allow programs

to complete workflow steps. "The API provides a function called 'wxGetExecReturnStatus' that returns a status of the execution phase. As reflected in decision step 292, this function can be called during the post-execution phase to set the state of the step." *Id.* Hence, the system of Berg provides, via an API, functions specifically designed to enable the program to provide a status of each step in the workflow. Based on the status information provided via the API (not via a callback URL), the workflow manager of Berg can decide whether to restart the workflow after a given step is performed. Hence, the API structure of Berg renders unnecessary any use of a callback URL, and the use of a callback URL would in fact change Berg's principle of operation. For at least this additional reason, there can be no motivation or suggestion to modify Berg to operate in the manner indicated by claim 45, and claim 45 therefore is allowable over Berg.

Conclusion

In view of the foregoing, the applicant believes all claims now pending in this application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,

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